

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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1199SEIU UNITED HEALTHCARE WORKERS EAST,

Petitioner,

v.

PSC COMMUNITY SERVICES, NEW PARTNERS, INC. D/B/A PARTNERS IN CARE, STELLA ORTON HOME CARE AGENCY, RICHMOND HOME NEEDS, SUNNYSIDE HOME CARE PROJECT, SUNNYSIDE CITYWIDE HOME CARE, FAMILY HOME CARE OF BROOKLYN AND QUEENS, CARE AT HOME, CHINESE-AMERICAN PLANNING COUNCIL HOME ATTENDANT PROGRAM, UNITED JEWISH COUNCIL OF THE EAST SIDE HOME ATTENDANT SERVICE CORP., THE FIRST CHINESE PRESBYTERIAN COMMUNITY AFFAIRS HOME ATTENDANT CORP., AZOR HOME CARE, BUSHWICK STUYVESANT HEIGHTS HOME ATTENDANT, INC., CABS HOMECARE, RIVERSPRING LICENSED HOMECARE SERVICES AGENCY, INC., ST. NICHOLAS HUMAN SUPPORTS CORP., WARTBURG, ALLIANCE FOR HEALTH, INC., REGION CARE, INC., SPECIAL TOUCH HOME CARE SERVICES, INC., RAIN, INC., PRESTIGE HOME CARE, INC., PRESTIGE HOME ATTENDANT, INC. D/B/A ALL SEASON HOME ATTENDANT, PERSONAL TOUCH HOME CARE OF N.Y., INC., PRIORITY HOME SERVICES, PREMIER HOME HEALTH CARE, INC., BRONX JEWISH COMMUNITY COUNCIL HOME ATTENDANT SERVICES, CIDNY INDEPENDENT LIVING SERVICES, HOME CARE SERVICES FOR INDEPENDENT LIVING, NEW YORK FOUNDATION FOR SENIOR CITIZENS HOME ATTENDANT SERVICES, COOPERATIVE HOME CARE ASSOCIATES, RISEBORO HOME CARE, INC., FEGS HOME ATTENDANT SERVICES, HOME HEALTH MANAGEMENT SERVICES, INC., SCHOOL SETTLEMENT HOME ATTENDANT CORP., ROCKAWAY HOME ATTENDANT, BRONXWOOD HOME FOR THE AGED, INC., ACCENTCARE OF NY, INC., ISABELLA VISITING CARE, INC., SOCIAL CONCERN COMMUNITY DEVELOPMENT CORP.,

DECLARATION OF
BRIJESH SHAH

Case No.
20-cv-03611-JGK

ABC HEALTH SERVICES REGISTRY, ALLIANCE
HOME SERVICES, *collectively identified by the
Arbitrator as the “HOME HEALTH CARE AGENCIES”*,

Respondents.

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STATE OF NEW JERSEY)
) ss.:
COUNTY OF PASSAIC)

I, BRIJESH SHAH, declare pursuant to 28 U.S.C. § 1746 and subject to penalties of perjury, that the following is true and correct:

1. I am the Applications Manager, Management Information Systems for Petitioner 1199SEIU United Healthcare Workers East (“Union” or “1199”).
2. In my capacity as Applications Manager, I have access to certain Union records, which include records containing the members of 1199 bargaining units and those members’ dates of employment. These records are maintained in the normal course of business.
3. The report attached hereto as Exhibit A shows the contents of the Union’s records with respect to the dates of employment in an 1199 bargaining unit position for the following 12 individuals: Seferina Acosta, Eugenia Barahona Alvarado, Carmen Carrasco, Mei Kum Chu, Sau King Chung, Dulce Herrera, Epifania Hichez, QunXiang Ling, Elida Agustin Mejia Herrera, Leticia Panama Rivas, Alvaro Ramirez-Guzman, and Gail Yan.



BRIJESH SHAH

Date: December 7, 2020

Exhibit A

PersonID	JobID	FirstName	LastName	Employer	HireDate	FinalDate
602854	610145	Seferina	ACOSTA	First Chinese Presb. CAHA, Corp	12/3/2004 0:00	7/5/2012 0:00
602854	809408	Seferina	ACOSTA	CLOSED - United Jewish Council Licensed Home Inc.	2/12/2007 0:00	8/31/2010 0:00
602854	810155	Seferina	ACOSTA	United Jewish of East Side HAS	2/12/2007 0:00	1/24/2017 21:06
1165953	1380214	Eugenia	Barahona Alvarado	Alliance for Health, Inc	4/5/2013 0:00	8/31/2015 0:00
1165953	1944973	Eugenia	Barahona Alvarado	Personal Touch Home Care of NY	4/25/2019 0:00	4/30/2020 0:00
500073	460985	CARMEN	CARRASCO	United Jewish of East Side HAS	10/31/2002 0:00	1/24/2017 21:06
500073	845332	CARMEN	CARRASCO	CLOSED - First Aide	4/12/2006 0:00	4/30/2011 0:00
500073	1170596	CARMEN	CARRASCO	Home Care Svc for Independent Living	5/21/2011 0:00	10/31/2020 0:00
500073	1462859	CARMEN	CARRASCO	NY Foundation Scha Service Inc.	3/29/2014 0:00	5/20/2020 0:00
477551	431556	MEI KUM	Chu	Chinese American Planning Council	1/25/2003 0:00	11/1/2013 0:00
530935	505758	Sau King	Chung	Chinese American Planning Council	8/4/2003 0:00	7/31/2014 10:49
464275	416173	DULCE	HERRERA	United Jewish of East Side HAS	9/25/2002 0:00	6/1/2017 0:00
464275	1448727	DULCE	HERRERA	NY Foundation Scha Service Inc.	3/29/2014 0:00	10/31/2020 0:00
457331	407335	Epifania	Hichez	United Jewish of East Side HAS	4/23/2002 0:00	6/19/2014 0:00
699973	749064	QunXiang	Ling	Chinese American Planning Council	3/23/2006 0:00	7/31/2015 0:00
367641	281199	ELIDA AGUSTIN	Meija Herrera	First Chinese Presb. CAHA, Corp	6/23/2000 0:00	10/31/2015 0:00
367641	819280	ELIDA AGUSTIN	Meija Herrera	CLOSED - United Jewish Council Licensed Home Inc.	5/22/2007 0:00	8/31/2010 0:00
367641	831592	ELIDA AGUSTIN	Meija Herrera	United Jewish of East Side HAS	5/3/2007 0:00	3/31/2014 0:00
783156	867332	Leticia	Panama Rivas	First Chinese Presb. CAHA, Corp	12/17/2007 0:00	5/31/2015 0:00
784633	869593	ALVARO	RAMIREZ-GUZMAN	First Chinese Presb. CAHA, Corp	3/22/2008 0:00	1/24/2017 21:06
784633	1295018	ALVARO	RAMIREZ-GUZMAN	United Jewish of East Side HAS	3/2/2012 0:00	11/15/2017 0:00
784633	1465597	ALVARO	RAMIREZ-GUZMAN	FEGS Home Attendant Services	5/16/2014 0:00	10/31/2020 0:00
784633	1470997	ALVARO	RAMIREZ-GUZMAN	CLOSED - FEGS Homecare Services Inc.	5/16/2014 0:00	9/28/2015 0:00
642551	657940	Gail	Yan	First Chinese Presb. CAHA, Corp	8/8/2005 0:00	9/30/2014 0:00